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April 28, 2004

The Honorable Bruce Duke
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Duke:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for April 2004 and preliminary May 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with April data, and previews the changes BellSouth is considering making for May data. A Data Disclosure Report for March 2004 would be filed at this time as well, if needed; however, for March 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

There are four additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its November 2003 Data Notification filed on October 27, 2003, BellSouth provided notice of coding changes necessary to correctly capture and report PMAP information due to ENCORE Release 14.0. This change, which was item No. 1 on the Proposed November 2003 Data Notification, was not implemented completely for ELMS6 Directory Listing products, and BellSouth made additional changes with February 2004 data to address this problem.

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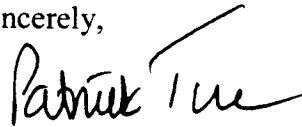
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Second, in its December 2003 Data Notification filed on January 7, 2004, BellSouth provided notice of a change to the calculation of the interval for the OSS-1 measure. This change, which was Item No. 3 on the Proposed December 2003 Data Notification, was to correct an error in the way PMAP flags certain CRIS transactions that come through LENS. This change was not implemented completely with December data, and BellSouth will make additional coding changes with May 2004 data to address this problem.

Third, in its January 2004 Data Notification filed on January 7, 2004, BellSouth provided notice of changes to Measure P-7C (Item 6) and Measure P-8 (Item 8). These changes were not worked as scheduled and will be implemented with March 2004 data.

Fourth, in its January 2004 Data Notification filed on January 7, 2004, BellSouth provided notice of a change to all provisioning measures to address negative intervals that result when service orders appear in the data with an issue date that is later than the due date (Item 11). This change was not worked as scheduled and will be implemented with May 2004 data.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

PC Docs # 535745

PROPOSED APRIL 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the April 2004 data month. Results for the April 2004 data month will be posted as follows:

Preliminary results May 21, 2004
Final results May 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-1 & O-2

Description of Change: In some cases, PMAP is not correctly matching EDI acknowledgements to EDI records, resulting in the data indicating that an acknowledgement was not sent when in fact it was sent. Bellsouth proposes to use an additional field in the source data to resolve this problem. This proposed change was Item (1) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4898)

Impact of Change: In both August and September 2003, one record was missed as a result of this problem.

(2) *Affected Measures:* O-3 & O-4

Description of Change: Currently, LNP LSRs with an error code of 9843, which occurs due to invalid or missing CSR data in CRIS, are counted as BellSouth fallout on the LNP Flow-Through report. Consistent with the SQM, LSRs that fall out for manual handling due to invalid or missing CSR data in CRIS should be planned manual fallout. BellSouth proposes to correct this error. This proposed

change was Item (2) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4960)

Impact of Change: For December 2003, LNP Percent Flow-Through would have increased by 1.02%, from 93.40% to 94.40%.

Provisioning Measurements

- (3) *Affected Measures:* P-4 & P-4B (Georgia only)

Description of Change: Currently, the analogs for UNE Other Design, UNE ISDN and UNE Combo Other do not appear on the monthly report; however, these same analogs are reported for other products where applicable, BellSouth proposes to start reporting the analogs on the SQM reports for these products also. This proposed change was Item (3) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4773)

Impact of Change: Retail analog data will be displayed.

- (4) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, P-10 & P-11

Description of Change: Currently, on the CLEC-specific reports all activity on a line that has been split between a voice and data provider (Line Splitting) is recorded as belonging to the voice provider. BellSouth proposes to assign activity on the data part of the line to the data provider and only activity on the voice part of the line to the voice provider. This proposed change was Item (4) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4863)

Impact of Change: For November 2003, on a region-wide basis, 506 line-splitting orders and 6 line sharing orders were assigned incorrectly.

- (5) *Affected Measures:* P-1, P-2, P-3, P-4, P-4B, P-5, P-6, P-9 & P-10

Description of Change: Currently, only service orders with Line Splitting USOCs and an action code of "I" (Inward activity) are assigned to the Line Splitting category. BellSouth proposes a coding change so that service orders with Line Splitting USOCs and an action code of "T" (To activity) also will be assigned to Line Splitting. This proposed change was Item (5) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4871)

Impact of Change: For November 2003, in Georgia, the PMI volume for UNE Line Splitting would increase from 6 to 110 with no change in equity. The volume for UNE-P would decrease from 86,135 to 86,025 with no change in equity.

Other

- (6) *Affected Measures:* CM-5

Description of Change: Currently, BellSouth produces an SRS report that only shows the average result across all interfaces; however the SQM requires data to be posted by interface. BellSouth proposes to change the report to include results for each interface. This proposed change was Item (6) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4873)

Impact of Change: Interface results will be displayed.

- (7) *Affected Measures:* All CLEC specific Measures

Description of Change: Currently, when the SQM requires BellSouth to produce CLEC specific data, BellSouth has been providing data by Operation Company Number (OCN). However, in many cases, a single company may have multiple OCNs so data for that CLEC can only be obtained if the CLEC adds together the data reported for each of its multiple OCNs. In response to requests from several CLECs, BellSouth proposes to produce for each sub-metric a single data set for those CLECs that have multiple OCNs. The only exception will be for reports for which the SQM expressly requires that data be reported at the OCN level; for those reports data will continue to be reported below the parent OCN level. BellSouth also will continue to make available data by OCN in the SQM raw data. This proposed change was Item (7) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4877)

Impact of Change: This change will impact display of the State and Regional CLEC specific reports. The display of CLEC Aggregate and 12 month reports will not be affected.

Special Access Measurements

- (8) *Affected Measures:* SA-8

Description of Change: Currently, there are Special Access records that are being double and triple counted due to a PMAP coding discrepancy. BellSouth proposes to update the PMAP report code to join multiple tables together through the use of a unique key. This change will eliminate overstating the numerator or volumes counts. This proposed change was Item (8) on the Preliminary April Data Notification filed on February 2, 2004. (RQ4851)

Impact of Change: For November 2003, the changes would result in the following New Installation Trouble Report Rates for Georgia: for below DS3, the rate for BSLD decreased from 6.59% to 4.45%, and the rate for INCs decreased from 6.36% to 5.71%; for DS3 and above, the rate for BSLD increased from 0.00% to 66.67% (mainly due to the small volumes), and the rate for INCs increased from 1.49% to 3.95%.

PRELIMINARY MAY 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the May 2004 data month. Results for the May 2004 data month will be posted as follows:

Preliminary results June 21, 2004
Final results June 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-9

Description of Change: Currently, for Directory Listing orders, the Completion Notice timestamp is overriding the Firm Order Confirmation notice (FOC) timestamp for LSRs submitted via EDI or TAG using the TCIF9 map. BellSouth proposes to obtain the FOC information from another table to capture the appropriate timestamp. (RQ5036)

Impact of Change: For January 2004, in Georgia, the results for Partially Mechanized UNE Other Non-Design would increase from 82.16% to 88.54%.

(2) *Affected Measures:* OSS-1

Description of Change: During the conversion process of mechanizing the OSS-1 measure, BellSouth identified several issues with the reporting of OSS-1 data. BellSouth proposes the following changes to be made to correct this reporting: (i) add additional filter to more accurately identify transactions, contract events, and timestamps for queries launched through EDI, LENS, and TAG/XML; (ii) include omitted DD and DSAP contract events in transaction reporting; (iii) eliminate extraneous contract events, such as RSAG queries by DSAP; (iv) correct

reporting of RSAG Transactions as DSAP transactions in North Carolina; and (v) add additional constraints to more accurately capture and report response intervals as summation of events and to properly associate transactions and events to the appropriate reporting period. (RQ5053, RQ5054, RQ5055, RQ5056, and RQ5057)

Impact of Change: BellSouth continues to investigate the cumulative impact of these proposed changes and will quantify this impact as soon as possible.

Provisioning Measurements

- (3) *Affected Measures:* P-7A (Florida, Tennessee and North Carolina)

Description of Change: Currently, for this measure, BellSouth reports both IDLC and Non-IDLC data on the same report. BellSouth also produces the same Non-IDLC data in another report. BellSouth proposes to remove the Non-IDLC data from the IDLC report as it is duplicative. (RQ4872)

Impact of Change: None

- (4) *Affected Measures:* P-12 (North Carolina)

Description of Change: Currently, LNP Percent Missed Installation Appointments data is being reported for North Carolina, even though this measure is not part of the North Carolina SQM. BellSouth proposes to remove this measure consistent with the SQM. (RQ4885)

Impact of Change: None

- (5) *Affected Measures:* P-11 (Georgia, Florida and Tennessee)

Description of Change: Currently, BellSouth classifies any LEO order as partially mechanized for this measure if it has a character string of "t-signout" in the audit log. BellSouth has determined that some orders with this code were being completed without service representative intervention. BellSouth proposes providing an additional check by looking at the SOCS history file for user ID's to verify that the order is partially mechanized. (RQ4959)

Impact of Change: For January 2004, in the region, 220 fully mechanized orders in Georgia, Florida, and Tennessee were included in the partially mechanized volume of the Service Order Accuracy metric. The change to the metric is less than 0.01%.

- (6) *Affected Measures:* P-7C

Description of Change: BellSouth has discovered that it is overstating circuit counts for this measure. BellSouth proposes to change the lookup tables to accurately determine the appropriate circuit count. (RQ4988)

Impact of Change: For December 2003, in Georgia, the trouble report rate would change from .57% to 1.07%. For the same period in Florida, the trouble report rate would change from .46% to .88%.

- (7) *Affected Measures:* P-7A

Description of Change: Currently, BellSouth is producing summary rows on the one-month aggregate report for this measure, even though these rows contain no data and are not required by the SQM. BellSouth proposes removing these summary rows from the report. (RQ5000)

Impact of Change: None

- (8) *Affected Measures:* P-7 (Louisiana only)

Description of Change: Currently, for the CLEC MSA reports, some interval buckets are being duplicated. BellSouth propose to eliminate duplication of interval buckets. (RQ5003)

Impact of Change: None

M&R Measurements

- (9) *Affected Measures:* MR1, 2, 3, 4 & 5 (North Carolina and Tennessee)

Description of Change: Currently, BellSouth is counting troubles and line counts in both the UNE Digital Loop and UNE Other-Design disaggregations. BellSouth proposes to correct this problem by eliminating these circuits and troubles from the UNE Other-Design disaggregation. (RQ4972)

Impact of Change: Numerator and denominator values for the UNE Other-Design disaggregations will be reduced for the measures impacted. Based on December 2003 data, North Carolina and Tennessee CTRR numerators will be reduced to "0" and line counts will be reduced by approximately 97%.

Billing Measurements

(10) *Affected Measures:* B-10

Description of Change: Currently, some billing adjustments that are disputed by BellSouth are erroneously being captured in this measure. BellSouth proposes to change the code to exclude these billing disputes consistent with the SQM. (RQ5015)

Impact of Change: For December 2003, 89 disputes in the region that were not due within the December reporting period should have been excluded from this metric. The results for the region would have increased from 90.71% to 92.75%.

Special Access Measurements

(11) *Affected Measures:* SA-7 (Georgia, Florida, and Tennessee)

Description of Change: Currently, the code is not marking the records that are past due from a previous month in the current month's report. The report is displaying all circuits that are candidates for the Past Due Circuits measure from the previous month, including those circuits that are past due. BellSouth proposes to display all the circuits due in the current month, but have an original committed due date in a previous month, as the volume for this measure consistent with the SQM. Once the base is established, the report will display any circuit that was past due and canceled, as the numerator for the measure. The metric is determined by dividing the volume into the numerator, times 100. (RQ4859)

Impact of Change: For November 2003, in Florida, the volume of circuits for the Percent Cancellations after FOC due date would decrease from 50 to 2.

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed April 2004 Data Notification Report and Preliminary May 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this April 28, 2004:

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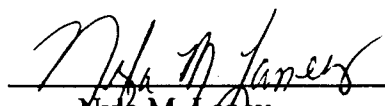
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